

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,	)	CASE NO. 8:22CR157
	)	
Plaintiff,	)	
	)	
vs.	)	<b>AMENDED UNOPPOSED MOTION TO</b>
	)	<b>EXTEND PRETRIAL MOTIONS</b>
ROLANDO MIDDER,	)	<b>DEADLINE</b>
	)	
Defendant.	)	
	)	

The Defendant, Rolando Midder, by and through undersigned counsel, hereby moves for an enlargement of time of 90 additional days in which to file pretrial motions. In support of this request, the Defendant states:

1. The Progression Order established August 23, 2022, as the deadline for filing any pretrial motions.
2. The discovery provided by the government is comprised of voluminous amounts of audio, video and documents. All of these items need to be reviewed prior to Counsel's final decision is made on motion practice in this case.
3. Defense counsel has discussed with the Defendant his right to a speedy trial. Defendant does not wish to waive his rights to speedy trial in this matter.
4. Assistant U.S. Attorney Kelli L. Ceraolo, advised counsel that the government has no objections to this continuance.

WHEREFORE, Defendant requests the Court extend the date for filing pretrial motions for an additional 90 days.

ROLANDO MIDDER, Defendant

By: s/ Julie B. Hansen

**JULIE B. HANSEN**

**Assistant Federal Public Defender**

222 South 15<sup>th</sup> Street, Suite 300N

Omaha, NE 68102

(402) 221-7896

fax: (402) 221-7884

email: julie\_b\_hansen@fd.org